

## REMARKS

The Final Office Action dated July 10, 2008 indicated that claims 15-17 stand objected to, and that claims 1-17 stand rejected under Section 102(b) over Kuroda (U.S. Patent Pub. 2001/0039643). Applicant further does not acquiesce to any averments made in the Office Action, unless Applicant expressly indicates otherwise.

Applicant maintains the traversals of record, and fully incorporates the previously-filed responses. Moreover, Applicant believes that the cited references fail to disclose a power distribution network as in the amended claims, which are directed to limitations including decoupling cells and circuit elements arranged such that the combined length of connections to the respective circuit elements is about constant among (predominantly) all circuit elements. That is, the respective circuit elements are connected to power and ground busses in a manner that ensures that the length of the connections is about the same for all elements, thus reducing or eliminating on-chip voltage variation. This is consistent, for example, with various supportive example embodiments shown in and described in connection with the figures, the Abstract and claims as filed, with a particular exemplary embodiment shown in FIG. 3 and described at paragraph 0023.

The cited reference has no bearing upon the claim limitations, and is instead directed to “non-logic” cells that are arranged as capacitors to achieve a specific capacitance value (*see, e.g.*, FIG. 7 and corresponding discussion at paragraph 0093). These non-logic cells accordingly do not couple or decouple circuit elements as suggested in the Final Office Action and certainly do not provide any static current as claimed by Applicant. Moreover, the Office Action improperly attempts to argue that the alleged “decoupling cells” shown in FIG. 6 would be combined with the alleged “circuit elements” in FIG. 4, whereas FIG. 6 does not show a cell or circuit distance but rather shows a schematic equivalent (*i.e.*, a virtual representation) of the cited cells (*e.g.*, 30) in FIG. 4. The cited reference is therefore inapplicable to the claimed invention as a whole.

In view of the above, and as consistent with the Examiner’s indications via telephone (on December 9<sup>th</sup>, 2008), Applicant believes that the Section 102(b) rejections continue to be inapplicable and requests that they be removed. Applicant further believes that the cited reference does not disclose limitations in new claims 18-20, including those

directed to a plurality of decoupling cells connected to a particular circuit element, and to a decoupling cell that is coupled to different circuit elements. Support for these limitations may be found in FIG. 3 and corresponding discussion as referenced above.

Applicant believes that the objections are also inapplicable because the terms upon which the objections were based are no longer in the claims.

In consideration of the above, Applicant believes that each of the rejections and objections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of NXP Corporation at (408) 474-9063.

*Please direct all correspondence to:*

Corporate Patent Counsel  
NXP Intellectual Property & Standards  
1109 McKay Drive; Mail Stop SJ41  
San Jose, CA 95131

By: 

Name: Robert J. Crawford  
Reg. No.: 32,122  
(NXPS.459PA)

CUSTOMER NO. 65913